

**Draft Desk Statement
Internal and Deliberative**

Re: April 22, 2020, Ninth Circuit Court of Appeals' Decision on the National Resources Defense Council's (NRDC) petition to cancel all registered pet uses for the pesticide tetrachlorvinphos (TCVP)

Statement:

EPA takes its commitment to protecting children's health seriously and will continue to meet all deadlines in the registration review process for TCVP. The agency is reviewing the Court's decision and will promptly comply with its directive.

Background:

The pesticide tetrachlorvinphos (TCVP) is currently undergoing EPA registration review, an agency program that re-evaluates all pesticides on a 15-year cycle. This is a comprehensive, scientific and transparent process that will further evaluate TCVP's potential effects. EPA bases its regulatory determinations on scientific risk assessments and risk mitigation, consistent with U.S. federal law.

Timeline of EPA's registration review process for TCVP:

- In 2008 EPA initiated the registration review process for TCVP.
- In 2009 NRDC filed a petition for EPA to cancel all pet uses of TCVP.
- In 2014 EPA initially issued a denial to the petition based on the available data at the time.
- In 2015 NRDC filed a petition for review of EPA's denial.
- In 2016, during the pendency of that petition for review, the agency completed its final human health risk assessment for TCVP, which found risks of concern for people, including children, in residential settings exposed to dusts/powder products and pet collars; and exposure to workers applying TCVP.
- In 2017, EPA published an addendum to the human health risk assessment and informed NRDC that the agency intends to address any risk mitigation issues in the course of TCVP's registration review.
- In 2019 EPA required the sole registrant of TCVP pet uses, Hartz Mountain Corporation, to submit a study to address the composition of pet collars.
- The agency will revise its human health risk assessment to incorporate new data addressing the composition of pet collars.

Ex. 5 Deliberative Process (DP)

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[HYPERLINK "<https://www.epa.gov/ingredients-used-pesticide-products/tetrachlorvinphos-tcvp>"]